

# WISCONSIN LEGISLATURE

P. O. Box 7882 Madison, WI 53707-7882

June 24, 2019

Ms. Rebecca Cameron Valcq, Chairperson  
Public Service Commission of Wisconsin  
PO Box 7854  
Madison, WI 53707-7854

Dear Commissioner Valcq:

We are writing today to ask you and your agency to ensure that comprehensive cost/benefit analysis of non-transmission alternatives be conducted in the PSC review process for all proposed high voltage transmission lines going forward including Cardinal Hickory Creek (Docket 5-CE-146). All four of us have had a great deal of communication from local units of governments and concerned constituents about this project, and continue to receive contacts on it.

With the rapid expansion of high-voltage transmission (HVT) facilities throughout Wisconsin over the past ten years, they have had substantial impacts on rates and fixed fee increases. There are rising concerns among electric customers that the agency has not been giving equal, detailed attention to the long-term benefits of non-transmission alternatives, and we share those concerns.

The public deserves due diligence in examination of the comparison of what their rate payments to build and maintain a new transmission line could instead gain for them if they were spent on conservation education, energy efficiency, load management and the development of local renewable energy.

This letter is a follow up to the June 2018 letter to the Public Service Commission from Senator Erpenbach, Representative Considine, Representative Pope, and Representative Hesselbein – our concerns are not new (see enclosed). We are pleased that other Legislators have recently urged your agency to significantly improve the analysis of non-transmission alternatives in the course of the HVT review process. Our request is that you consider the measures listed below – especially as they affect the Cardinal Hickory Creek project.

- 1.) Enhance the discussion of non-transmission alternatives in Section 2.5 of the PSC's HVT Application Filing Requirements by requiring applicants to provide detailed, quantified presentations of the economic and environmental benefits residential customers would receive if the total cost over 40 years required to build, finance, operate and maintain the HVT transmission option were invested, instead, in conservation, energy efficiency and load management. The analysis should include head to head comparison of benefits in terms that ratepayers can understand of the non-transmission, transmission-only and no build options.
- 2.) Specify that the discussion of non-transmission alternatives in Section 2.6.1 of the HVT Application Filing Requirements include detailed, quantified estimates of costs and economic and environmental benefits associated with eliminating the need for the applicant's low voltage transmission reliability projects by alternatively targeting optimized combinations of energy efficiency, load management and local renewable energy installations including community solar. These alternatives should emphasize individual and community funding returning benefits to these parties while avoiding the creation of long-term, utility capital debt. The analysis of alternatives must include clear, head to head

comparison of benefits with the transmission options in presentations that electric customers and decision makers can easily understand.

- 3.) During the review process and in conducting PSC staff research for the required Environmental Impact Statement, adhere to SS.1.11(2)(e) to "study, develop, and describe" least impactful alternatives and "recommend course of action in any proposal which involves unresolved conflicts concerning alternatives uses of available resources." PSC staff should be required to independently examine and compare non-transmission alternatives as required of the applicants in Sections 2.5 and 2.6.1 of the HVT Application Filing Requirements with added incentive to find and recommend viable alternatives.
- 4.) To ensure that the PSC's HVT review process produces a confirmable assessment of non -transmission alternatives, the agency needs to complement the above measures with an impartial, third party cost-benefit analysis adhering to the criteria defined above.

We ask that you respond to these requests that we have made so that we may share the information with our constituents. Additionally, please submit and record this letter to docket # 05-CE-146 and record verbatim in the appendix of the EIS should the application proceed to that stage.

Thank you for your attention to this request and please contact any of us should you have any questions.

Sincerely,



JON ERPENBACH  
State Senator  
27th District

DIANNE HESSELBEIN  
State Representative  
79th District



SONDY POPE  
State Representative  
80th District

DAVE CONSIDINE  
State Representative  
81st District